

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

AGERE SYSTEMS, INC., et al.	:	
	:	
Plaintiffs	:	Civil Action No. 02-CV-3830
v.	:	
	:	
ADVANCED ENVIRONMENTAL	:	
TECHNOLOGY CORPORATION, et al.,	:	
	:	
Defendants.	:	

**DEFENDANT ASHLAND CHEMICAL, INC.'S MOTION TO COMPEL  
PLAINTIFFS ANSWERS TO CONTENTION INTERROGATORIES**

Pursuant to Rule 37 of the Federal Rules of Civil Procedure, Eastern District of Pennsylvania Local Civil Rules 7.1 and 26.1, and paragraph A. 4. of the Court's Tenth Case Management Order, dated April 30, 2007, Defendant Ashland Inc. ("Ashland") respectfully moves this Court to compel Plaintiffs to respond to Defendants' Joint Contention Interrogatories and Ashland's Contention Interrogatories, as follows:

1. Plaintiffs shall withdraw all general and specific objections to Defendants' Joint Contention Interrogatories and Ashland's Contention Interrogatories based upon the form of the Interrogatory or because the interrogatory requested Plaintiffs to state a contention that was not part of Plaintiffs' prima facie case.

2. Plaintiff shall serve full and complete responses to Joint Contention Interrogatories 29-32, 47, 48, 53, 72, 111, 118, 124 and 125.

3. Plaintiffs shall supplement their responses to Joint Contention Interrogatories 76-82 by stating the Plaintiffs' contention for each Plaintiff's allocable/equitable share of the Total Clean Up Costs for OU-1 and OU-2 and the amount that Plaintiff will pay for OU-2 and OU-2 Total Clean Up Costs when all agreements, understandings and processes to which Plaintiffs are

a party are resolved and each Plaintiff's actual contribution is conclusively determined.

4. Plaintiffs shall supplement their responses to Joint Contention Interrogatory 78 by identifying the complete factual basis for the contentions stated therein without qualifications by such language as "including, but not limited to."

5. Plaintiffs shall serve a full and complete response to Ashland's Contention Interrogatory No. 3.

Defendants, including Ashland, have in good faith conferred and/or attempted to confer with Plaintiffs in an effort to resolve this dispute and secure adequate disclosures without the Court's intervention.

The grounds for Ashland's Motion are more fully set forth in the accompanying Memorandum of Law, which Memorandum is incorporated by reference. A proposed Order is attached pursuant to Local Rule 7.1

Respectfully submitted,

s/ David M. Doto  
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Counsel for Defendant Ashland Inc.,  
designated by Plaintiff as  
Ashland Chemical Company

Dated: June 1, 2007  
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